



CLARK COUNTY • DEPARTMENT OF AIR QUALITY
4701 W. Russell Road Suite 200 • Las Vegas, NV 89118-2231
(702) 455-5942 • Fax (702) 383-9994
Lewis Wallenmeyer Director

January 6, 2014

Meredith Kurpius, Ph.D.
Manager, Air Quality Analysis Office
EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105

E-mail: kurpius.meredith@epa.gov

RE: New Road Site Approval Request

Dear Dr. Kurpius:

As you know, 40 CFR Part 58.10 requires the design of a near roadway monitoring network based on guidance provided by EPA's Near-Road NO₂ Monitoring Technical Assistance Document (TAD) published in June of 2012. The operational start date and number of monitoring locations is based on Core Based Statistical Area (CBSA) population, requiring that the first locations be operational no later than January 1, 2014 for CBSAs with a population of 1 million or more. CBSAs with a population of 2.5 million or more (or population of 500,000 or more that has one or more roadway segments with 250,000 or greater AADT counts) require a second location, which must be operational no later than January 1, 2015. The plan for establishing these locations are to be submitted to the EPA Region as part of the monitoring agencies Annual Network Plan no later than July 1st.

DAQ is required to operate two near-road sites in the Las Vegas valley. The first site must be operational by the January 1, 2014 and the second site by the January 1, 2015. In order to ensure the first location chosen meets the guidelines specified in the TAD, and so it can be operational as soon as possible, DAQ is requesting that EPA Region 9 treat this document as a portion of the Annual Network Plan by reviewing the attached information and approving the proposed location as quickly as possible. In the event that the proposed location is not approvable, we request specific, timely guidance on the necessary measures needed to receive approval.

DAQ believes this site is an acceptable choice because of the Near Road Analysis that captured key considerations such as: large volume traffic density, vehicle mix on I-15/Las Vegas Freeway, congestion, lack of interfering roadside design structures allowing monitoring of a flat, at-grade roadway, an open field situation without vegetation, a terrain scale placement near and lower than a densely travelled interchange design, closest building structure will be at 2730 S. Rancho Drive, Las Vegas NV 89102, just west of the site across the low traffic density frontage road, and a meteorology that supports subsidence monitoring during the winter months.

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Meredith Kurpius, Ph.D.

December 30, 2013

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In addition, our office has conferred with the site property owners, City of Las Vegas, and have received an informal approval for use but are awaiting the city attorney's signature to execute the right away agreement.

This letter and the attached information will also be submitted as part of the Air Monitoring Annual Network Plan and will be posted to the Clark County Air Quality website to allow for public comment. Please contact me if you have any questions or concerns about this request or the attachments at (702) 455-1603.

Sincerely,

Phillip Wiker
Manager, Air Quality Monitoring
Clark County Department of Air Quality

Attachments:

1. Near Road Site Ratings 2012
2. Near-Road Candidate Site Comparison Matrix 2012
3. R9 Near-road NO₂ Plan Review Checklist
4. NDOT 2012 Clark AADT
5. NDOT 2012 Clark Traffic Classification Report
6. NDOT Appendix-B – Congestion Management and Project Selection Process
7. NDOT Project Neon
8. NDOT Freeway Performance Tables 2013.06
9. Near Road Monitoring Technical Assistance Document – June 2012
10. Nevada 2010 Census of Population
11. Wind Rose Paul Mayer
12. Wind Rose Sunrise Acres
13. Google Earth KMZ file
14. Twelve (12) photos of the site and surrounding area

cc: E. Felix
G. Yoshimura